

Exhibit 1

Part 1 of 7

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS x 03 MDL 1570 (RCC)
ON SEPTEMBER 11, 2001 x

This document relates to:

Thomas Burnett, Sr. v. Al Baraka Investment & Develop. Corp., 03 CV 9849 (RCC)
Ashton v. Al Qaeda, et al., 02 CV 6977 (RCC)

**SECOND SUPPLEMENTAL AFFIDAVIT OF
ABDULLAH BIN HAMAD AL-WOHAIBI**

In the Name of God, the Merciful, the Compassionate, I, Abdallah bin Hamad Al-Wohaibi, state the following:

1. I am the Director of the Legal Department of the Ministry of Finance of the Government of the Kingdom of Saudi Arabia ("Ministry of Finance"). This affidavit supplements my two prior affidavits, the first ("Original Affidavit") executed on 26/6/1424H, corresponding to August 24, 2003, and the second executed on 24/12/1424H, corresponding to February 15, 2004. I submit this Second Supplemental Affidavit in further support of the Motion to Dismiss these lawsuits as against The National Commercial Bank ("National Bank" or "NCB"), and to respond to assertions made in two affidavits submitted by the plaintiffs: (1) "Supplemental Affidavit [David. K. Draper] in Further Opposition to National Commercial Bank's Motion to Dismiss" (the "Draper Affidavit"); and (2) "Supplemental Affidavit of John Fawcett in Support of Ashton Plaintiffs' Opposition to National Commercial Bank's Motion to Dismiss" (the "Supplemental Fawcett Affidavit"). I am competent to make this affidavit, which I have prepared and executed in Arabic with the understanding that it will be translated into English for submission to a U.S. court.

2. I understand that both the Draper Affidavit and the Supplemental Fawcett Affidavit rely on websites and other internet sources to contend that, at the time these two lawsuits were filed (August 15, 2002, and September 4, 2002, respectively), the PIF on behalf of the Ministry of Finance

